

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RIBAPHARM, INC.,)
a Delaware Corporation)
)
Plaintiff,)
v.) Civil Action No.: 02-3231
)
THREE RIVERS PHARMACEUTICALS, LLC,)
a Pennsylvania Limited Liability Company)
)
Defendant.)

MOTION FOR ADMISSION OF COUNSEL *PRO HAC VICE*

Defendant, Three Rivers Pharmaceuticals, LLC ("Three Rivers"), by and through its attorneys, Klett Rooney Lieber & Schorling, files the following Motion for Admission of Counsel *Pro Hac Vice* and states as follows:

1. Steven A. Maddox is an attorney with the law firm of McDermott, Will & Emery and is a member in good standing of the Bar of the District of Columbia, and is familiar with the facts and legal issues involved in this litigation.

2. Stephanie is an attorney with the law firm of Wiley Rein & Fielding LLP and is a member in good standing of the Bar of the District of Columbia, and is familiar with the facts and legal issues involved in this litigation.

3. Daniel J. Wadley is an attorney with the law firm of Wiley Rein & Fielding LLP and is a member in good standing of the Bars of the District of Columbia and the Commonwealth of Virginia and is familiar with the facts and legal issues involved in this litigation.

4. The above-identified attorneys have been requested by Liberty Mutual Insurance Company to represent it in this matter.

5. Because of their expertise in the issues involved herein and at the request of Liberty Mutual Insurance Company, the above-identified attorneys have requested that this application for Laura A. Foggan, Mary E. Borja, and Daniel J. Wadley for admission *pro hac vice* in this matter be made on their behalf.

6. The law firm of Klett Rooney Lieber & Schorling has been associated with Liberty Mutual Insurance Company as local counsel in this action and will continue in that role.

WHEREFORE, Liberty Mutual Insurance Company respectfully requests that this Honorable Court grant its Motion for the admission of Laura A. Foggan, Mary E. Borja, and Daniel J. Wadley, *pro hac vice*.

Respectfully submitted,

KLETT ROONEY LIEBER & SCHORLING

By: _____

Thomas B. O'Brien, Jr., Esq.

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(215) 567-7646

(215) 567-2737 (fax)

Attorneys for Defendant

Liberty Mutual Insurance Company

Dated: _____

CERTIFICATE OF SERVICE

I, Thomas B. O'Brien, hereby certify that I served or caused to be served, on this day a copy of the attached Motion for Admission *Pro Hac Vice* upon all counsel of record via facsimile and regular mail.

Thomas B. O'Brien, Jr.

Dated: _____

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DRAVO CORPORATION,	:	
	:	CIVIL ACTION NO. 96-CV-2098
Plaintiff,	:	
	:	The Hon. Robert J. Cindrich
VS.	:	
	:	Mag. Judge Kenneth J. Benson
LIBERTY MUTUAL INSURANCE	:	
COMPANY and THE HARTFORD	:	
ACCIDENT AND INDEMNITY COMPANY,	:	
	:	
Defendants.	:	

ORDER

AND NOW, this ____ day of _____, 2002, upon consideration of the foregoing Motion for Admission of Counsel *Pro Hac Vice*, it is hereby ORDERED that Laura A. Foggan, Mary E. Borja and Daniel J. Wadley be admitted *pro hac vice* to appear as co-counsel to Liberty Mutual Insurance Company in the matter herein.

SCHILLER, U.S.D.J